Georgia-Pacific

Georgia-Pacific LLC

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September 17, 2012

Mr. Doug Sweeris
Superintendent
Allegan Wastewater Plant
350 North Street
Allegan, MI 49010

Subject:
Georgia-Pac-Willow Blvd-OU2-SF
Cessation of the Willow Boulevard/A-Site Landfill Operable Unit Substantive Requirements Document and 2012 Phosphorus Point Source Reduction and Discharge

Dear Mr. Sweeris,

Georgia-Pacific LLC (Georgia-Pacific) is pleased to submit this letter providing notice that it no longer plans to participate in the Phosphorus Total Maximum Daily Load Point Source Group due to cessation of water treatment activities (and ultimately cessation of the Substantive Requirements Document [SRD]) at the Willow Boulevard/A-Site Operable Unit 2 (WB/A-Site OU). This letter also summarizes the efforts taken to reduce phosphorus loading to the Kalamazoo River during the construction and remedial activities at the WB/A-Site OU and the analytical results for effluent samples and the estimated total quantity of phosphorus discharged to the river in 2012.

The loading of phosphorus to the river during remedial activities was minimized by applying sediment management and water treatment techniques during active construction. Material excavated near the river was removed using an open-bucket excavator, and the excavation area was isolated from the river using a combination of sheetpile wall and turbidity curtain. Excavated material was then transported via truck to the designated consolidation area within the A-Site Landfill. Stormwater that accumulated during remedial activities was collected and treated in a multi-media filtration and carbon adsorption water treatment system prior to discharge to the Kalamazoo River and Davis Creek.

During the period from March 8 through August 14, 2012, Georgia-Pacific treated and discharged a total of 1,274,294 gallons of water. In accordance with the SRD MIU990030, water was treated and discharged as needed at Outfalls 001A and 003A. The volume of water treated and discharged was recorded daily and summarized on a monthly basis. The required influent, mid-point, and effluent sampling and analyses were also conducted as required by the SRD, and the analytical results were retained with the treatment and discharge data in the year-to-date log. Analytical and discharge volume data were used to calculate monthly loading quantities. The year-to-date log is available for review by request from the Facility Contact provided in the SRD. All samples were analyzed for polychlorinated biphenyl and total suspended solids. In accordance with the SRD, an effluent sample was analyzed for total phosphorus once a month to document the contribution of phosphorus to the Kalamazoo River from the WB/A-Site OU.

Effluent samples from six discharge batches were submitted to laboratories for analysis of total phosphorus in accordance with the United States Environmental Protection Agency SW846 Method SM 4500-P.E, B5. Effluent samples from March 22 and April 5 were analyzed by TestAmerica Laboratories, Inc. in Burlington, Vermont and effluent samples from May 15, June 5, July 20, and August 9 were analyzed by KAR Laboratories, Inc. in Kalamazoo, Michigan. The reported total phosphorus concentrations ranged between non-detect (0.02 U milligrams per liter [mg/L]) and 0.12 mg/L with a volume-weighted average phosphorous discharge of 0.055 mg/L. Based on this average, an estimated total of 0.59 pounds of phosphorus was discharged in 2012. See Table 1 for additional information.

At the A-Site Landfill, excavation activities have been completed and installation of the final cover system is currently ongoing. Other construction activities at the WB/A-Site OU are scheduled to continue until December 2012, with restoration work continuing into 2013. Since onsite water treatment and discharge is not anticipated for these construction activities, water treatment and discharge has been permanently discontinued. The onsite water treatment system was decontaminated and demobilized on August 21, 2012. Georgia-Pacific has submitted an SRD closure notification to the Michigan Department of Environmental Quality and will no longer participate in the Phosphorus Total Maximum Daily Load Point Sources Group for the Kalamazoo River/Lake Allegan Watershed.

Please do not hesitate to contact me at (734) 735-0780 with any questions regarding this letter.

Sincerely,

Garry Griffith, P.E.
Director – Environmental Field Services

cc: Alvin Lam, MDEQ
Michael Bray, MDEQ
Kristi Zakrzewski, P.E., MDEQ
Michael Berkoff, USEPA
Pat McGuire, ARCADIS
Bill Rankin, P.E., ARCADIS
EJ Suardini, ARCADIS

Georgia-Pacific LLC

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site

Willow Boulevard/A-Site Operable Unit 2

Substantive Requirements Document MIU990030

Table 1 - Summary of Phosphorus Sampling and Discharge in 2012

Discharge Period	Discharge Volume (gallons)	Total Phosphorus Concentration (mg/L)[1]
3/8/2012 - 3/22/2012	273,916	0.079
3/23/2012 - 4/5/2012	326,897	0.049
4/6/2012 - 5/15/2012	256,035	0.055
5/16/2012 - 6/5/2012	270,789	0.020
6/6/2012 - 7/20/2012	137,179	0.090
7/21/2012 - 8/14/2012	9,478	0.090
Volume-weighted average discharge (mg/L)[1]		0.055
Total Discharge (gal)[2]		1,274,294
Total Mass P Discharged (lbs)[2]		0.59

Notes:

1. Effluent concentrations averaged where applicable. Non-detect was counted as half the detection limit.
2. For all water discharged in 2012.

lbs - pounds

mg/L - milligrams per liter

P - total phosphorus

Conversion Factors:

1 gal = 3.78 L

1 mg = $2.2 * 10^{-6}$ lbs